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FILED
Clerk
District Court

MAR 15 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

TRANS PACIFIC EXPORT COMPANY
LLC,

Plaintiff,

vs.

MARY ANN S. MILNE,

Defendant.

Civil Action No. CV 05-0032

**PLAINTIFF'S CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: March 17, 2006
Time: 9:00 a.m.
Judge: Alex R. Munson

This Case Management Conference Statement is filed by and on behalf of TRANS PACIFIC EXPORT COMPANY LLC, Plaintiff.

a. **SERVICE OF PROCESS:** Plaintiff alleges that it has perfected service of process on defendant. Defendant has filed a counterclaim to which Plaintiff has responded.

b. **JURISDICTION:** The jurisdiction of the Court over this matter is founded on 28 USC § 1332.

c. **TRACK ASSIGNMENT:** Defendants recommend that the case be assigned to the normal track assignment.

d. **ANTICIPATED MOTIONS:** Motions may be noticed as the facts are gathered through discovery. None are anticipated at this time.

1 e. **ANTICIPATED DISCOVERY:** Interrogatories will be served on plaintiff. A
2 Request to Produce will be made on defendant to provide those documents upon which the
3 answers to interrogatories were based. Depositions will be taken here in Saipan and perhaps the
4 United States.

5 f. **FURTHER PROCEEDINGS:** Dates set by the court in its normal course for
6 further proceedings is appropriate in this case.

7 g. **SPECIAL PROCEDURES:** No special procedures need be calendared at this
8 time.

9 h. **MODIFICATION OF PRETRIAL PROCEDURES:** No modification of the
10 standard pretrial procedures is required.

11 i. **SETTLEMENT PROSPECTS:** Settlement prospects at this time are good. The
12 Court is aware that the parties were extremely close in settling this case very recently. This case
13 is one that it is in the best interest of everyone to settle.

14 j. **OTHER MATTERS INCLUDING LIMITATION OF ISSUES:** Nothing is
15 anticipated at this time.

16 k. **SCHEDULING DATES:**

17 i. **JOINDER OF ALL PARTIES:** Plaintiff requests joinder of parties
18 by July 2006.

19 ii. **MOTIONS TO AMEND:** Defendants request any motion to amend
20 pleading be scheduled no sooner than July 2006.

21 iii. **DISCOVERY CUT-OFF:** Defendants request that discovery cut-
22 off be set for June 2006.

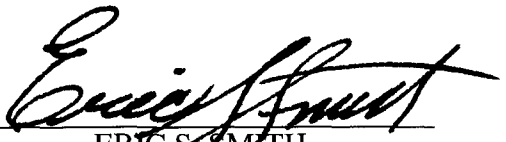
23 iv. **STATUS CONFERENCES:** Defendants request that the first status
24 conference be scheduled in the Summer 2006.

25 v. **DISCOVERY MOTIONS HEARING DATE:** Defendants request
26 that the date for discovery motions be set in August 2006.

27 vi. **DISPOSITIVE MOTION CUT-OFF:** Defendants request that all be
28 dispositive motions be heard no later than September 2006.

- vii. SETTLEMENT CONFERENCE: Defendants request that another settlement conference be set in May, 2006.
- viii. JOINT PRETRIAL ORDER: Defendants do not have any preference for a date for submission of a joint pretrial order.
- ix. FINAL PRETRIAL CONFERENCE: Defendants do not have any preference for a date for a final pretrial conference.
- x. TRIAL: Defendants request that trial in this matter be set in November 2006.

Date: March 15, 2006


ERIC S. SMITH
Attorney for the Plaintiff